



Office of Government Ethics  
Suite 500  
1201 New York Avenue, NW  
Washington, DC 20005-3917

Comments on RIN 3209-AA04, Proposed Amendments to Part 2635

International Code Council contact:  
David Karmol, Vice President for Federal and External Affairs  
[dkarmol@iccsafe.org](mailto:dkarmol@iccsafe.org)

**Background**



The Department of Defense references the International Building Code for constructing military facilities, including those that house U.S. troops, domestically and abroad. Many of these same Federal agencies, and many others, are members of ICC, and personnel from these agencies regularly attend and participate in the code development process that ICC manages to update and revise its model codes.

In addition to the development of the codes, and the publication of the codes, ICC also publishes a broad range of publications, that assist those who use and enforce the codes to understand the rationale for code provisions, the methods to achieve compliance and the recommended procedures to assure that the code provisions are effectively incorporated into building systems and structures. ICC provides a range of educational programs, in a wide variety of formats and venues, all aimed at the goal of improving the safety, healthiness and energy efficiency of the built environment. Code officials, fire marshals, engineers, contractors, designers and other construction industry participants all utilize the educational and publication products and services offered by the code council.







by law to participate in and utilize, are actually the “trade associations” that are referred to as specifically not included in the exception that is at issue in this proposed regulation.

We strongly encourage OGE to look at this issue, and to carve out a very clear exception for standards and code development activity, t